

U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*


MEMO ENDORSED

December 13, 2024

Application GRANTED. Defendant shall file its Answers no later than **January 15, 2025. SO ORDERED.**

By ECF

The Honorable Dale E. Ho
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007


Dale E. Ho
United States District Judge
Dated: December 13, 2024
New York, New York

Re: *Helen Greene Johnson v. United States of America*, 24 Civ. 872 (DEH);
Muhammad A. Aziz v. United States of America, 24 Civ. 874 (DEH)

Dear Judge Ho:

This Office represents the United States of America (“Government”), defendant in these two related actions brought pursuant to the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671 *et seq.* We write respectfully to request a twenty-one-day extension of the deadline for the Government to file its Answers, currently due December 26. The Government requires additional time to prepare its Answers in light of the number and breadth of allegations in the *Aziz* and *Greene-Johnson* complaints, which contain 293 and 288 paragraphs, respectively; the fact that the Government is simultaneously devoting significant efforts to its ongoing document discovery obligations; and the upcoming holidays.

This is the Government’s first request to extend the deadline to respond to the Complaints in these consolidated matters. If the Court grants the Government’s request, the Answers would be due January 15. Plaintiffs consent to the Government’s request.

We thank the Court for its attention to this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Ilan Stein
ILAN STEIN
DANIELLE J. MARRYSHOW
JEFFREY OESTERICH
Assistant United States Attorneys for the
Southern District of New York
Tel.: (212) 637-2525/2689/2695
Email: ilan.stein@usdoj.gov
danielle.marryshow@usdoj.gov
jeffrey.oestericher@usdoj.gov

cc: Plaintiffs' counsel (via ECF)